

UNITED STATES OF AMERICA
NATIONAL LABOR RELATIONS BOARD
CHARGE AGAINST EMPLOYER

DO NOT WRITE IN THIS SPACE

Case
01-CA-299996Date Filed
7-25-2022

INSTRUCTIONS:

File an original with NLRB Regional Director for the region in which the alleged unfair labor practice occurred or is occurring.

1. EMPLOYER AGAINST WHOM CHARGE IS BROUGHT

a. Name of Employer Starbucks Corporation		b. Tel. No. (b) (6), (b) (7)(C)
		c. Cell No.
		f. Fax No.
d. Address (Street, city, state, and ZIP code) 2401 Utah Avenue South, Suite 800 Seattle, WA 98134 874 Commonwealth Ave, Brookline, MA 02446	e. Employer Representative Howard Schultz, CEO (b) (6), (b) (7)(C) (b) (6), (b) (7)(C)@starbucks.com	g. e-mail (b) (6), (b) (7)(C)@starbucks.com
		h. Number of workers employed 30
		i. Type of Establishment (factory, mine, wholesaler, etc.) Coffee shop
j. Identify principal product or service Food and beverage		

The above-named employer has engaged in and is engaging in unfair labor practices within the meaning of section 8(a), subsections (1) and (list subsections) (5) and (3) of the National Labor Relations Act, and these unfair labor practices are practices affecting commerce within the meaning of the Act, or these unfair labor practices are practices affecting commerce within the meaning of the Act and the Postal Reorganization Act.

2. Basis of the Charge (set forth a clear and concise statement of the facts constituting the alleged unfair labor practices)

In the past six months, the above-named Employer, by its officers, agents, and representatives, has interfered with, restrained, and coerced employees in the exercise of their rights as guaranteed in Section 7 of the Act and engaged in conduct toward employees attempting to discourage union activity, by acts and conduct including the following, which began immediately after workers at the store voted to be represented by the Union:

Engaging in massive reduction of hours; threatening discipline; stricter enforcement of policies; imposing a new availability policy; failure to give notice or an opportunity to bargain to the Union over any of the above. The Union requests relief under Section 10(j) of the Act.

3. Full name of party filing charge (if labor organization, give full name, including local name and number)
Workers United

4a. Address (Street and number, city, state, and ZIP code) 22 South 22nd Street, Philadelphia, PA 19103	4b. Tel. No. 267-709-4037
	4c. Cell No.
	4d. Fax No.
	4e. e-mail richard.minter@workers-united.org

5. Full name of national or international labor organization of which it is an affiliate or constituent unit (to be filled in when charge is filed by a labor organization)
Workers United, a/w SEIU

6. DECLARATION

I declare that I have read the above charge and that the statements
are true to the best of my knowledge and belief.

Ian Hayes, Attorney

(signature of representative or person making charge)

(Print/type name and title or office, if any)

Tel. No.
716-608-3427

Office, if any, Cell No.

Fax No.

e-mail
ihayes@hayesdolce.comHayes Dolce
Address 135 Delaware Ave., Ste. 502, Buffalo, NY 14202

Date 7-25-22

WILLFUL FALSE STATEMENTS ON THIS CHARGE CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001)
PRIVACY ACT STATEMENT

Solicitation of the information on this form is authorized by the National Labor Relations Act (NLRA), 29 U.S.C. § 151 et seq. The principal use of the information is to assist the National Labor Relations Board (NLRB) in processing unfair labor practice and related proceedings or litigation. The routine uses for the information are fully set forth in the Federal Register, 71 Fed. Reg. 74942-43 (Dec. 13, 2006). The NLRB will further explain these uses upon request. Disclosure of this information to the NLRB is voluntary; however, failure to supply the information may cause the NLRB to decline to invoke its processes.

UNITED STATES OF AMERICA
NATIONAL LABOR RELATIONS BOARD
CHARGE AGAINST EMPLOYER

DO NOT WRITE IN THIS SPACE	
Case 03-CA-290555	Date Filed 2/14/2022

INSTRUCTIONS:

File an original with NLRB Regional Director for the region in which the alleged unfair labor practice occurred or is occurring.

1. EMPLOYER AGAINST WHOM CHARGE IS BROUGHT	
a. Name of Employer Starbucks Corporation	(b) (6), (b) (7)(C)
	c. Cell No.
	f. Fax No.
d. Address (Street, city, state, and ZIP code) 2401 Utah Avenue South, Suite 800 Seattle, WA 98134	(b) (6), (b) (7)(C)
(see attached for Buffalo-area location addresses)	(see attached for (b) (6), (b) (7)(C))
	(b) (6), (b) (7)(C)@starbucks.com
	h. Number of workers employed 500
i. Type of Establishment (factory, mine, wholesaler, etc.) Coffee shop	j. Identify principal product or service Food and beverage
<p>The above-named employer has engaged in and is engaging in unfair labor practices within the meaning of section 8(a), subsections (1) and (list subsections) (3); (5) of the National Labor Relations Act, and these unfair labor practices are practices affecting commerce within the meaning of the Act, or these unfair labor practices are practices affecting commerce within the meaning of the Act and the Postal Reorganization Act.</p>	
<p>2. Basis of the Charge (set forth a clear and concise statement of the facts constituting the alleged unfair labor practices)</p> <p>Since around February 2022, the Employer has been implementing a policy throughout the Buffalo area regarding an employee availability requirement, under which employees are facing termination, (1) in order to discourage Union activity and (2) at its union-represented Elmwood Ave and Genesee St locations, (i) without giving the Union notice or an opportunity to bargain and (ii) without obtaining the Union's consent, despite the parties not having reached overall agreement or impasse on a first contract.</p> <p>The Union seeks injunctive relief under Section 10(j) of the Act to prevent irreparable destruction of employee rights resulting from Starbucks' unlawful conduct.</p>	
3. Full name of party filing charge (if labor organization, give full name, including local name and number) Workers United	
4a. Address (Street and number, city, state, and ZIP code) 2954 Main Street, Suite 556 Buffalo, NY 14214	4b. Tel. No. 585-473-3280
	4c. Cell No.
	4d. Fax No.
	4e. e-mail gobonadonnajr@nrlb.org
5. Full name of national or international labor organization of which it is an affiliate or constituent unit (to be filled in when charge is filed by a labor organization) Workers United, a/w SEIU	
6. DECLARATION	
<p>I declare that I have read the above charge and that the statements are true to the best of my knowledge and belief.</p>	
 (signature of representative or person making charge)	Ian Hayes, Attorney (Print/type name and title or office, if any)
Hayes Dolce Address 471 Voorhees Ave, Buffalo, NY 14216	Tel. No. 716-608-3427 Office, if any, Cell No. Fax No. e-mail ihayes@hayesdolce.com
Date Feb 14, 2022	

**WILLFUL FALSE STATEMENTS ON THIS CHARGE CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001)
PRIVACY ACT STATEMENT**

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Attachment to Unfair Labor Practice charge

Section 1.d – Address

520 Lee Entrance, Amherst, NY 14228 (Store #7318)
1703 Niagara Falls Blvd, Amherst, NY 14226 (Store #07327)
8100 Transit Road Suite 100, Williamsville, NY 14221 (Store #07337)
5429 Main Street, Williamsville, NY 14221 (Store #07340)
933 Elmwood Avenue, Buffalo, NY 14222-1211 (Store #07381)
235 Delaware Avenue, Buffalo, NY 14202 (Store #07448)
3540 McKinley Parkway, Blasdell, NY 14219 (Store #07486)
4770 Transit Road, Depew, NY 14043 (Store #07665)
2730 Delaware Avenue, Buffalo, NY 14216 (Store #07799)
5395-5495 Sheridan Drive, Amherst, NY 14221 (Store #07938)
1775 Walden Ave. Ste 500, Cheektowaga, NY 14225 (Store #07949)
9660 Transit Road 101, East Amherst, NY 14051 (Store #10750)
6690 Niagara Falls Boulevard, 100, Niagara Falls, NY 14304 (Store #19901)
6703-6733 Transit Rd., Buffalo, NY 14221 (Store #22882)
4243 Genesee St., Cheektowaga, NY 14225 (Store #23917)
3220 Sheridan Drive, Amherst, NY 14226 (Store #47843)
3015 Niagara Falls Blvd., Amherst, NY 14228 (Store #50060)
5120 Camp Road, Hamburg, NY 14075-2704 (Store #59087)
3235 Southwestern Blvd, Orchard Park, NY 14127 (Store #63771)

Section 1.e – Employer Representative

(b) (6), (b) (7)(C)

(b) (6), (b) (7)(C)

(b) (6), (b) (7)(C)

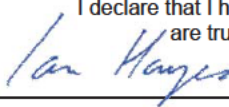
(b) (6), (b) (7)(C)@starbucks.com

UNITED STATES OF AMERICA
NATIONAL LABOR RELATIONS BOARD
CHARGE AGAINST EMPLOYER

DO NOT WRITE IN THIS SPACE	
Case 03-CA-293362	Date Filed 04/012022

INSTRUCTIONS:

File an original with NLRB Regional Director for the region in which the alleged unfair labor practice occurred or is occurring.

1. EMPLOYER AGAINST WHOM CHARGE IS BROUGHT			
a. Name of Employer Starbucks Corporation		(b) (6), (b) (7)(C)	
		c. Cell No.	
		f. Fax No.	
d. Address (Street, city, state, and ZIP code) 2401 Utah Avenue South, Suite 800 Seattle, WA 98134 4770 Transit Road, Depew, NY 14043		e. Employer Representative Howard Schultz, CEO (b) (6), (b) (7)(C) starbucks.com	
		(b) (6), (b) (7)(C) @starbucks.com	
		h. Number of workers employed 30	
i. Type of Establishment (factory, mine, wholesaler, etc.) Coffee shop		j. Identify principal product or service Food and beverage	
The above-named employer has engaged in and is engaging in unfair labor practices within the meaning of section 8(a), subsections (1) and (list subsections) (3) (5) of the National Labor Relations Act, and these unfair labor practices are practices affecting commerce within the meaning of the Act, or these unfair labor practices are practices affecting commerce within the meaning of the Act and the Postal Reorganization Act.			
2. Basis of the Charge (set forth a clear and concise statement of the facts constituting the alleged unfair labor practices) See attached			
3. Full name of party filing charge (if labor organization, give full name, including local name and number) Workers United			
4a. Address (Street and number, city, state, and ZIP code) 2954 Main Street, Suite 556 Buffalo, NY 14214		4b. Tel. No. 585-473-3280	
		4c. Cell No.	
		4d. Fax No.	
		4e. e-mail gbonadonnajr@nrlb.org	
5. Full name of national or international labor organization of which it is an affiliate or constituent unit (to be filled in when charge is filed by a labor organization) Workers United, a/w SEIU			
<p align="center">6. DECLARATION</p> <p>I declare that I have read the above charge and that the statements are true to the best of my knowledge and belief.</p> <p align="center"> _____ (signature of representative of person making charge)</p> <p align="center">Ian Hayes, Attorney _____ (Print/type name and title or office, if any)</p> <p>Hayes Dolce Address 471 Voorhees Ave., Buffalo, NY 14216</p>		Tel. No. 716-608-3427	
		Office, if any, Cell No.	
		Fax No.	
		e-mail ihayes@hayesdolce.com	
Date Apr 1, 2022			

**WILLFUL FALSE STATEMENTS ON THIS CHARGE CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001)
PRIVACY ACT STATEMENT**

Solicitation of the information on this form is authorized by the National Labor Relations Act (NLRA), 29 U.S.C. § 151 *et seq.* The principal use of the information is to assist the National Labor Relations Board (NLRB) in processing unfair labor practice and related proceedings or litigation. The routine uses for the information are fully set forth in the Federal Register, 71 Fed. Reg. 74942-43 (Dec. 13, 2006). The NLRB will further explain these uses upon request. Disclosure of this information to the NLRB is voluntary; however, failure to supply the information may cause the NLRB to decline to invoke its processes.

Attachment to Charge Against Employer

Section 2- Basis of the Charge:

In the past six months, the above-named Employer, by its officers, agents, and representatives, has interfered with, restrained, and coerced employees in the exercise of their rights as guaranteed in Section 7 of the Act and engaged in conduct toward employees attempting to discourage union activity, by acts and conduct including the following:

On or about (b) (6), (b) (7)(C), 2022, by terminating union supporter (b) (6), (b) (7)(C); and

On or about (b) (6), (b) (7)(C), 2022, by terminating union supporter (b) (6), (b) (7)(C).

The Union was certified by the NLRB as the bargaining representative of employees on March 17, 2022, following a ballot count on March 9, 2022. Despite this, the Employer did not give notice or an opportunity to bargain over the discipline of (b) (6), (b) (7)(C) or (b) (6), (b) (7)(C), in violation of its obligations to bargain under the Act.

The Union seeks expedited injunctive relief under Section 10(j) of the Act to prevent irreparable destruction of employee rights by Starbucks' illegal activity, which is increasing in aggression and severity daily.

UNITED STATES OF AMERICA
NATIONAL LABOR RELATIONS BOARD
CHARGE AGAINST EMPLOYER

DO NOT WRITE IN THIS SPACE	
Case 03-CA-295470	Date Filed 5/10/2022

INSTRUCTIONS:

File an original with NLRB Regional Director for the region in which the alleged unfair labor practice occurred or is occurring.

1. EMPLOYER AGAINST WHOM CHARGE IS BROUGHT			
a. Name of Employer Starbucks Corporation		b. Te. No. (b) (6), (b) (7)(C)	
		c. Ce. No.	
		f. Fax. No.	
d. Address (Street, city, state, and ZIP code) 2401 Utah Avenue South, Suite 800 Seattle, WA 98134 402 College Ave, Ste 402, Ithaca, NY 14850		e. Employer Representative Howard Schultz, CEO (See attached for District Managers)	
		g. e-mail (b) (6), (b) (7)(C) @starbucks.com	
		h. Number of workers employed 30	
i. Type of Establishment (factory, mine, wholesaler, etc.) Coffee Shop		j. Identify principal product or service Food and beverage	
The above-named employer has engaged in and is engaging in unfair labor practices within the meaning of section 8(a), subsections (1) and (list subsections) (3); (5) of the National Labor Relations Act, and these unfair labor practices are practices affecting commerce within the meaning of the Act, or these unfair labor practices are practices affecting commerce within the meaning of the Act and the Postal Reorganization Act.			
2. Basis of the Charge (set forth a clear and concise statement of the facts constituting the alleged unfair labor practices) See Attached			
3. Full name of party filing charge (if labor organization, give full name, including local name and number) Workers United			
4a. Address (Street and number, city, state, and ZIP code) 2954 Main Street, Suite 556 Buffalo, NY 14214		4b. Te. No. 585-473-3280	
		4c. Ce. No.	
		4d. Fax No.	
		4e. e-mail gbonadonnajr@nrlb.org	
5. Full name of national or international labor organization of which this is an affiliate or constituent unit (to be filled in when charge is filed by a labor organization) Workers United, a/w SEIU			
6. DECLARATION I declare that I have read the above charge and that the statements are true to the best of my knowledge and belief. /s/ Michael Dolce (signature of representative or person making charge)		Te. No. 716-912-3480 Office, if any, Ce. No. Fax No. e-mail mdolce@hayesdolce.com	
Michael Dolce, Attorney (Print/type name and title or office if any)			
Hayes Dolce, 471 Voorhees Ave, Buffalo, NY 14216 Address		May 9, 2022 Date	

**WILLFUL FALSE STATEMENTS ON THIS CHARGE CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001)
PRIVACY ACT STATEMENT**

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Attachment to Charge Against Employer

Section 1.e - Employer Representatives

(b) (6), (b) (7)(C)

@starbucks.com

Section 2 – Basis of Charge

The above-named Employer, by its officers, agents and representatives, has interfered with, restrained, and coerced employees in the exercise of their rights as guaranteed in Section 7 of the Act, by acts and conduct including the following:

- Since about November 2021 and continuing to present, by engaging in surveillance of employees and creating the impression of surveillance by stationing multiple “support managers” at the College Ave. store;
- Since about November 2021 and continuing to present, creating the impression of surveillance and engaging in surveillance by scheduling managers at the College Ave. store during additional operating hours;
- Since about November 2021 and continuing to present, by creating the impression of surveillance and intimidating employees by having high-ranking corporate officials repeatedly visit the College Ave. store;
- Since about November 2021 and continuing to present, by installing security cameras in the College Ave. store to surveil and otherwise intimidate employees in response to organizing activity;
- Since about November 2021 and continuing to present, by interrogating and otherwise intimidating Union supporters at the College Ave. store;
- Since about November 2021 and continuing to April 2022, by holding mandatory or effectively mandatory captive audience meetings;
- Since about November 2021 and continuing to April 2022, by threatening employees with the loss of benefits if they chose to unionize;
- On February 6, 2022, by threatening an employee with the loss of benefits if they chose to unionize;
- On March 9, 2022, by threatening an employee with the loss of benefits if they chose to unionize;
- On March 21, 2022, by threatening employees with discipline, including suspensions and write-ups, in response to union activity;
- Since about November 2021 and continuing to April 2022, by soliciting employee grievances in response to organizing activity;
- Since about November 2021 and continuing to April 2022, by promising employees benefits in response to organizing activity and employee grievances;
- In about November 2021, by promising employees more hours in response to organizing activity and employee grievances;
- On February 23, 2022, by promising employees free parking outside the store on College Ave. in response to organizing activity and employee grievances;

- On March 24, 2022, by promising employees a remodel of the store in response to organizing activity and employee grievances;
- Since about November 2021 and continuing to April 2022, by granting benefits in response to organizing activity and employee grievances;
- In January 2022, by improving equipment and facilities at the College Ave. store in response to organizing activity and employee grievances;
- In about January 2022 and continuing to March 2022, remodeling the store to remedy employees' grievances regarding store conditions;
- On January 30, 2022, by allowing employees to enforce the mask mandate and remove noncompliant customers from the store, thereby granting a benefit in response to organizing activity and employee grievances;
- In about March 2022, by no longer allowing shift supervisors to close the store's café, and shut down mobile ordering upon request;
- In about February 2022 and continuing to present, by changing where and how trainees at the College Ave. store are trained, resulting in loss of income and changed working conditions for employees at the store;
- On March 21, 2022, by changing its back-of-house drink policy in response to union activity;
- On February 24, 2022, by no longer allowing shift supervisors to cover barista shifts and by altering shift supervisors' playcalling responsibilities;
- In about February 2022 and continuing to present, by discriminatorily enforcing its dress code policy against union supporters;
- In about March 2022 and continuing to present, by enforcing a new "limited availability" policy in response to union activity;
- In about February 2022 and continuing to present, by cutting the hours of employees in response to union activity;
- In about March 2022 and continuing to present, by reducing staff scheduled to work;
- In about February 2022 and continuing to April 2022, by recruiting and hiring new employees while cutting existing employees' hours in response to union activity;
- In about March 2022 and continuing to April 2022, by transferring in employees to the College Ave. store from other stores in response to union activity;
- In about March 2022 and continuing to April 2022, by discriminatorily enforcing its "pin" policy to exclude union paraphernalia;
- Since about January 2022 and continuing to April 2022, by removing union posters and paraphernalia from break areas and the community board in response to organizing activity;

The above-named Employer has engaged in conduct toward employees attempting to discourage union activity, including the following:

- In about November 2021, for disciplining an employee in response to union activity and to discourage union activity;
- In about March 2022 and continuing to April 2022, for not accommodating the time-off requests of six employees in response to union activity and to discourage union activity;
- In about March 2022 and continuing to present, for threatening employees with discharge for taking time-off in response to union activity and to discourage union activity;

- On April 19, 2022, by disciplining and issuing a Final Written Warning to an employee after not granting previously accommodated time-off requests;
- In about April 2022, by constructively discharging an employee after they were not granted previously accommodated time-off requests;
- On April 26, 2022, by disciplining and issuing a Written Warning to an employee for violations of previously unenforced rules in response to union activity and to discourage union activity;
- In about April 2022, by constructively discharging an employee after refusing to accommodate previously granted accommodations;
- In about April 2022 and continuing to present, by denying the previously permitted and/or approved transfers to other stores in response to union activity and to discourage union activity;
- In about April 2022 and continuing to present, for not accommodating the time-off requests of employees in response to union activity and to discourage union activity;
- In about April 2022 and continuing to present, for threatening employees with discharge for taking time-off in response to union activity and to discourage union activity;
- Since about February 2022 and continuing to present, union supporters have had their hours cut in response to their union activity and to discourage union activity;
- Since about March 2022 and continuing to present, by attempting to force employees to take LOAs because of their union activity and to discourage union activity;
- Since about February 2022 and continuing to present, by reducing the shifts available to shift supervisors and altering their job responsibilities in response to union activity and to discourage union activity;
- Since about March 2022 and continuing to present, by refusing to permit union supporters to train new employees;
- In about March 2022, by not signing an employee's LOA request in response to union activity and to discourage union activity;
- In about February 2022 and continuing to present, by discriminatorily enforcing its dress code policy against employees because of their union activity and to discourage union activity.

The NLRB certified the Union as the bargaining representative of employees on April 18, 2022, following a ballot count on April 8, 2022. Despite this, the Employer did not give notice or an opportunity to bargain over the disciplines or changes in scheduling of employees, in violation of its obligations to bargain under the Act.

The Union seeks injunctive relief under Section 10(j) of the Act to prevent irreparable destruction of employee rights resulting from Starbucks' unlawful conduct.

UNITED STATES OF AMERICA
NATIONAL LABOR RELATIONS BOARD
AMENDED CHARGE AGAINST EMPLOYER**DO NOT WRITE IN THIS SPACE**Case
3-CA-295470Date Filed
June 6, 2022**INSTRUCTIONS:**

File an original with NLRB Regional Director for the region in which the alleged unfair labor practice occurred or is occurring.

1. EMPLOYER AGAINST WHOM CHARGE IS BROUGHT

a. Name of Employer Starbucks Corporation		b. Telephone No. (b) (6), (b) (7)(C)
		c. Case No.
		f. Fax No.
d. Address (Street, city, state, and ZIP code) 2401 Utah Avenue South, Suite 800 Seattle, WA 98134 722 S. Meadow St., Ithaca, NY 14850	e. Employer Representative Howard Schultz, CEO (See attached for District Managers)	g. e-mail (b) (6), (b) (7)(C) @starbucks.com
		h. Number of workers employed 30
		i. Type of Establishment (factory, mine, wholesaler, etc.) Coffee Shop
j. Identify principal product or service Food and beverage		

The above-named employer has engaged in and is engaging in unfair labor practices within the meaning of section 8(a), subsections (1) and (list subsections) (3); (5) of the National Labor Relations Act, and these unfair labor practices are practices affecting commerce within the meaning of the Act, or these unfair labor practices are practices affecting commerce within the meaning of the Act and the Postal Reorganization Act.

2. Basis of the Charge (set forth a clear and concise statement of the facts constituting the alleged unfair labor practices)

See Attached

3. Full name of party filing charge (if labor organization, give full name, including local name and number)

Workers United

4a. Address (Street and number, city, state, and ZIP code) 2954 Main Street, Suite 556 Buffalo, NY 14214	4b. Telephone No. 585-473-3280
	4c. Case No.
	4d. Fax No.
	4e. e-mail gbonadonnajr@rrjb.org

5. Full name of national or international labor organization of which it is an affiliate or constituent unit (to be filled in when charge is filed by a labor organization)

Workers United, a/w SEIU

6. DECLARATION

I declare that I have read the above charge and that the statements
are true to the best of my knowledge and belief.

/s/ Michael Dolce

Michael Dolce, Attorney

(signature of representative or person making charge)

(Print/type name and title or office if any)

Hayes Dolce, 471 Voorhees Ave, Buffalo, NY 14216

Address

Date

~~May 9, 2022~~
June 3, 2022Telephone No.
716-912-3480

Office, if any, Case No.

Fax No.

e-mail
mdolce@hayesdolce.com**WILLFUL FALSE STATEMENTS ON THIS CHARGE CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001)
PRIVACY ACT STATEMENT**

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Attachment to Charge Against Employer

Section 1.e - Employer Representatives

(b) (6), (b) (7)(C)

@starbucks.com

Section 2 – Basis of Charge

The above-named Employer, by its officers, agents and representatives, has interfered with, restrained, and coerced employees in the exercise of their rights as guaranteed in Section 7 of the Act, by acts and conduct including the following:

- Since about January 2022 and continuing to present, by engaging in surveillance of employees and creating the impression of surveillance by stationing multiple “support managers” at the Meadows store;
- Since about January 2022 and continuing to present, creating the impression of surveillance and engaging in surveillance by scheduling managers at the Meadows store during additional operating hours;
- Since about January 2022 and continuing to present, by creating the impression of surveillance and intimidating employees by having high-ranking corporate officials repeatedly visit the Meadows store;
- Since about January 2022 and continuing to present, by interrogating and otherwise intimidating Union supporters at the Meadows store;
- Since about January 2022 and continuing to April 2022, by threatening employees with the loss of benefits if they chose to unionize;
- Since about January 2022 and continuing to April 2022, by soliciting employee grievances in response to organizing activity;
- In about January 2022, by shutting down and temporarily closing the Meadows store in response to organizing activity;
- In about February 2022 and continuing to present, by discriminatorily enforcing its dress code policy against union supporters;
- In about February 2022 and continuing to present, by cutting the hours of employees in response to union activity;
- In about March 2022 and continuing to present, by reducing staff scheduled to work;
- In about February 2022 and continuing to present, by recruiting and hiring new employees while cutting existing employees’ hours in response to union activity;
- In about March 2022 and continuing to April 2022, by discriminatorily enforcing its “pin” policy to exclude union paraphernalia;

The above-named Employer has engaged in conduct toward employees attempting to discourage union activity, including the following:

- On February 23, 2022, for disciplining an employee in response to union activity and to discourage union activity;

- In about March 2022 and continuing to present, for cutting the hours of employees in response to union activity and to discourage union activity;
- In about February 2022 and continuing to present, for disciplining employees in response to union activity and to discourage union activity;
- In about April 2022, for disciplining an employee for protected concerted activity in response to union activity and to discourage union activity;
- In about April 2022, for not granting an employee's previously accommodated time-off requests in response to union activity and to discourage union activity.

The NLRB certified the Union as the bargaining representative of employees on April 18, 2022, following a ballot count on April 8, 2022. Despite this, the Employer did not give notice or an opportunity to bargain over the disciplines or changes in scheduling of employees, in violation of its obligations to bargain under the Act.

The Union seeks injunctive relief under Section 10(j) of the Act to prevent irreparable destruction of employee rights resulting from Starbucks' unlawful conduct.

UNITED STATES OF AMERICA
NATIONAL LABOR RELATIONS BOARD
CHARGE AGAINST EMPLOYER

DO NOT WRITE IN THIS SPACE	
Case 03-CA-295474	Date Filed 5/10/2022

INSTRUCTIONS:

File an original with NLRB Regional Director for the region in which the alleged unfair labor practice occurred or is occurring.

1. EMPLOYER AGAINST WHOM CHARGE IS BROUGHT			
a. Name of Employer Starbucks Corporation		b. Te. No. (b) (6), (b) (7)(C)	
		c. Ce. No.	
		f. Fax. No.	
d. Address (Street, city, state, and ZIP code) 2401 Utah Avenue South, Suite 800 Seattle, WA 98134 722 S. Meadow St., Ithaca, NY 14850		e. Employer Representative Howard Schultz, CEO (See attached for District Managers)	
		g. e-mail (b) (6), (b) (7)(C) @starbucks.com	
		h. Number of workers employed 30	
i. Type of Establishment (factory, mine, wholesaler, etc.) Coffee Shop		j. Identify principal product or service Food and beverage	
The above-named employer has engaged in and is engaging in unfair labor practices within the meaning of section 8(a), subsections (1) and (list subsections) (3); (5) of the National Labor Relations Act, and these unfair labor practices are practices affecting commerce within the meaning of the Act, or these unfair labor practices are practices affecting commerce within the meaning of the Act and the Postal Reorganization Act.			
2. Basis of the Charge (set forth a clear and concise statement of the facts constituting the alleged unfair labor practices) See Attached			
3. Full name of party filing charge (if labor organization, give full name, including local name and number) Workers United			
4a. Address (Street and number, city, state, and ZIP code) 2954 Main Street, Suite 556 Buffalo, NY 14214		4b. Te. No. 585-473-3280	
		4c. Ce. No.	
		4d. Fax No.	
		4e. e-mail gbonadonnajr@nrlb.org	
5. Full name of national or international labor organization of which this is an affiliate or constituent unit (to be filled in when charge is filed by a labor organization) Workers United, a/w SEIU			
6. DECLARATION I declare that I have read the above charge and that the statements are true to the best of my knowledge and belief. /s/ Michael Dolce Michael Dolce, Attorney (signature of representative or person making charge) (Print/type name and title or office if any)		Te. No. 716-912-3480	
		Off. ce, if any, Ce. No.	
		Fax No.	
Hayes Dolce, 471 Voorhees Ave, Buffalo, NY 14216 Address		May 9, 2022 Date	
		e-mail mdolce@hayesdolce.com	

**WILLFUL FALSE STATEMENTS ON THIS CHARGE CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001)
PRIVACY ACT STATEMENT**

Solicitation of the information on this form is authorized by the National Labor Relations Act (NLRA) 29 U.S.C. § 151 et seq. The principal use of the information is to assist the National Labor Relations Board (NLRB) in processing unfair labor practice and related proceedings or litigation. The routine uses for the information are fully set forth in the Federal Register 71 Fed. Reg. 74942-43 (Dec. 13, 2006). The NLRB will further explain these uses upon request. Disclosure of this information to the NLRB is voluntary; however, failure to supply the information may cause the NLRB to decline to invoke its processes.

Attachment to Charge Against Employer

Section 1.e - Employer Representatives

(b) (6), (b) (7)(C)

@starbucks.com

Section 2 – Basis of Charge

The above-named Employer, by its officers, agents and representatives, has interfered with, restrained, and coerced employees in the exercise of their rights as guaranteed in Section 7 of the Act, by acts and conduct including the following:

- Since about January 2022 and continuing to present, by engaging in surveillance of employees and creating the impression of surveillance by stationing multiple “support managers” at the Meadows store;
- Since about January 2022 and continuing to present, creating the impression of surveillance and engaging in surveillance by scheduling managers at the Meadows store during additional operating hours;
- Since about January 2022 and continuing to present, by creating the impression of surveillance and intimidating employees by having high-ranking corporate officials repeatedly visit the Meadows store;
- Since about January 2022 and continuing to present, by installing security cameras in the Meadows store to surveil and otherwise intimidate employees in response to organizing activity;
- Since about January 2022 and continuing to present, by interrogating and otherwise intimidating Union supporters at the Meadows store;
- Since about January 2022 and continuing to April 2022, by holding mandatory or effectively mandatory captive audience meetings;
- Since about January 2022 and continuing to April 2022, by threatening employees with the loss of benefits if they chose to unionize;
- Since about January 2022 and continuing to April 2022, by soliciting employee grievances in response to organizing activity;
- Since about January 2022 and continuing to April 2022, by promising employees benefits in response to organizing activity and employee grievances;
- Since about January 2022 and continuing to April 2022, by granting benefits in response to organizing activity and employee grievances;
- In about January 2022, by shutting down and temporarily closing the Meadows store in response to organizing activity;
- In January 2022, by improving equipment and facilities at the Meadows store in response to organizing activity and employee grievances;
- In about January 2022 and continuing to present, by changing where and how trainees at the Meadows store are trained, resulting in loss of income and changed working conditions for employees at the store;

- In about February 2022 and continuing to present, by discriminatorily enforcing its dress code policy against union supporters;
- In about March 2022 and continuing to present, by enforcing a new “limited availability” policy in response to union activity;
- In about February 2022 and continuing to present, by cutting the hours of employees in response to union activity;
- In about March 2022 and continuing to present, by reducing staff scheduled to work;
- In about February 2022 and continuing to present, by recruiting and hiring new employees while cutting existing employees’ hours in response to union activity;
- In about March 2022 and continuing to April 2022, by transferring in employees to the Meadows store from other stores in response to union activity;
- In about March 2022 and continuing to April 2022, by discriminatorily enforcing its “pin” policy to exclude union paraphernalia;
- Since about January 2022 and continuing to April 2022, by removing union posters and paraphernalia from break areas and the community board in response to organizing activity.

The above-named Employer has engaged in conduct toward employees attempting to discourage union activity, including the following:

- On January 31, 2022, by threatening an employee in response to union activity and to discourage union activity;
- On February 23, 2022, for disciplining an employee in response to union activity and to discourage union activity;
- In about March 2022 and continuing to present, for cutting the hours of employees in response to union activity and to discourage union activity;
- In about February 2022 and continuing to present, for disciplining employees in response to union activity and to discourage union activity;
- In about April 2022 and continuing to present, for constructively discharging employees due to hour cuts and discriminatory enforcement of company policies;
- On March 26, 2022, by not granting a previously granted accommodation to an employee in response to union activity and to discourage union activity;
- On March 26, 2022, by refusing to let a partner work their shift and ordering them to leave the facility in response to union activity and to discourage union activity;
- On March 26, 2022, by threatening to call the police on an employee in response to union activity and to discourage union activity;
- In about March 2022 and continuing to April 2022, for suspending an employee in response to union activity and to discourage union activity;
- In about April 2022, for disciplining an employee for protected concerted activity in response to union activity and to discourage union activity;
- In about April 2022, for not granting an employee’s previously accommodated time-off requests in response to union activity and to discourage union activity.

The NLRB certified the Union as the bargaining representative of employees on April 18, 2022, following a ballot count on April 8, 2022. Despite this, the Employer did not give notice or an

opportunity to bargain over the disciplines or changes in scheduling of employees, in violation of its obligations to bargain under the Act.

The Union seeks injunctive relief under Section 10(j) of the Act to prevent irreparable destruction of employee rights resulting from Starbucks' unlawful conduct.

UNITED STATES OF AMERICA
NATIONAL LABOR RELATIONS BOARD
CHARGE AGAINST EMPLOYER

DO NOT WRITE IN THIS SPACE

Case

3-CA-295541

Date Filed

5/10/2022

INSTRUCTIONS:

File an original with NLRB Regional Director for the region in which the alleged unfair labor practice occurred or is occurring.

1. EMPLOYER AGAINST WHOM CHARGE IS BROUGHT

a. Name of Employer Starbucks Corporation		(b) (6), (b) (7)(C)
		c. Cell No.
		f. Fax No.
d. Address (Street, city, state, and ZIP code) 2401 Utah Avenue South, Suite 800 Seattle, WA 98134	e. Employer Representative Howard Schultz, CEO	(b) (6), (b) (7)(C) @starbucks.com
4243 Genesee St., Cheektowaga, NY 14225	(b) (6), (b) (7)(C) starbucks.com	h. Number of workers employed 30
i. Type of Establishment (factory, mine, wholesaler, etc.) Coffee shop	j. Identify principal product or service Food and beverage	

The above-named employer has engaged in and is engaging in unfair labor practices within the meaning of section 8(a), subsections (1) and (list subsections) (5) of the National Labor Relations Act, and these unfair labor practices are practices affecting commerce within the meaning of the Act, or these unfair labor practices are practices affecting commerce within the meaning of the Act and the Postal Reorganization Act.

2. Basis of the Charge (set forth a clear and concise statement of the facts constituting the alleged unfair labor practices)

In the past six months, the above-named Employer, by its officers, agents, and representatives, has interfered with, restrained, and coerced employees in the exercise of their rights as guaranteed in Section 7 of the Act, by acts and conduct including the following:

Starting in or around May 2022 and continuing, Starbucks has refused to engage in bargaining with the Union using a virtual meeting platform, despite proposing and agreeing to "ground rules" that required mutual agreement to meet in person, and has failed to bargain over any changes it wishes to propose to those "ground rules."

3. Full name of party filing charge (if labor organization, give full name, including local name and number)
Workers United

4a. Address (Street and number, city, state, and ZIP code) 2954 Main Street, Suite 556 Buffalo, NY 14214	4b. Tel. No. 585-473-3280
	4c. Cell No.
	4d. Fax No.
	4e. e-mail gbonadonna jr@rjrb.org

5. Full name of national or international labor organization of which it is an affiliate or constituent unit (to be filled in when charge is filed by a labor organization)
Workers United, a/w SEIU

6. DECLARATION

I declare that I have read the above charge and that the statements are true to the best of my knowledge and belief.

Ian Hayes, Attorney

(signature of representative of person making charge)

(Print/type name and title or office, if any)

Hayes Dolce

Address 471 Voorhees Ave., Buffalo, NY 14216

Date May 10, 2022

Tel. No.
716-608-3427

Office, if any, Cell No.

Fax No.

e-mail
ihayes@hayesdolce.comWILLFUL FALSE STATEMENTS ON THIS CHARGE CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001)
PRIVACY ACT STATEMENT

Solicitation of the information on this form is authorized by the National Labor Relations Act (NLRA), 29 U.S.C. § 151 et seq. The principal use of the information is to assist the National Labor Relations Board (NLRB) in processing unfair labor practice and related proceedings or litigation. The routine uses for the information are fully set forth in the Federal Register, 71 Fed. Reg. 74942-43 (Dec. 13, 2006). The NLRB will further explain these uses upon request. Disclosure of this information to the NLRB is voluntary; however, failure to supply the information may cause the NLRB to decline to invoke its processes.

UNITED STATES OF AMERICA
NATIONAL LABOR RELATIONS BOARD
CHARGE AGAINST EMPLOYER

DO NOT WRITE IN THIS SPACE

Case
3-CA-295542Date Filed
5/10/2022

INSTRUCTIONS:

File an original with NLRB Regional Director for the region in which the alleged unfair labor practice occurred or is occurring.

1. EMPLOYER AGAINST WHOM CHARGE IS BROUGHT

a. Name of Employer Starbucks Corporation		(b) (6), (b) (7)(C)
		c. Cell No.
		f. Fax No.
d. Address (Street, city, state, and ZIP code) 2401 Utah Avenue South, Suite 800 Seattle, WA 98134	e. Employer Representative Howard Schultz, CEO	(b) (6), (b) (7)(C) @starbucks.com
933 Elmwood Avenue, Buffalo, NY 14222-1211	(b) (6), (b) (7)(C) starbucks.com	h. Number of workers employed 30
i. Type of Establishment (factory, mine, wholesaler, etc.) Coffee shop	j. Identify principal product or service Food and beverage	

The above-named employer has engaged in and is engaging in unfair labor practices within the meaning of section 8(a), subsections (1) and (list subsections) (5) of the National Labor Relations Act, and these unfair labor practices are practices affecting commerce within the meaning of the Act, or these unfair labor practices are practices affecting commerce within the meaning of the Act and the Postal Reorganization Act.

2. Basis of the Charge (set forth a clear and concise statement of the facts constituting the alleged unfair labor practices)

In the past six months, the above-named Employer, by its officers, agents, and representatives, has interfered with, restrained, and coerced employees in the exercise of their rights as guaranteed in Section 7 of the Act, by acts and conduct including the following:

Starting in or around May 2022 and continuing, Starbucks has refused to engage in bargaining with the Union using a virtual meeting platform, despite proposing and agreeing to "ground rules" that required mutual agreement to meet in person, and has failed to bargain over any changes it wishes to propose to those "ground rules."

3. Full name of party filing charge (if labor organization, give full name, including local name and number)
Workers United

4a. Address (Street and number, city, state, and ZIP code) 2954 Main Street, Suite 556 Buffalo, NY 14214	4b. Tel. No. 585-473-3280
	4c. Cell No.
	4d. Fax No.
	4e. e-mail gbonadonna jr@rjrb.org

5. Full name of national or international labor organization of which it is an affiliate or constituent unit (to be filled in when charge is filed by a labor organization)
Workers United, a/w SEIU

6. DECLARATION

I declare that I have read the above charge and that the statements are true to the best of my knowledge and belief.

Ian Hayes, Attorney

(signature of representative of person making charge)

(Print/type name and title or office, if any)

Tel. No.
716-608-3427

Office, if any, Cell No.

Fax No.

e-mail
ihayes@hayesdolce.com

Hayes Dolce

Address 471 Voorhees Ave., Buffalo, NY 14216

Date May 10, 2022

WILLFUL FALSE STATEMENTS ON THIS CHARGE CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001)
PRIVACY ACT STATEMENT

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UNITED STATES OF AMERICA
NATIONAL LABOR RELATIONS BOARD
CHARGE AGAINST EMPLOYER

DO NOT WRITE IN THIS SPACE	
Case 3-CA-295545	Date Filed 5/11/2022

INSTRUCTIONS:

File an original with NLRB Regional Director for the region in which the alleged unfair labor practice occurred or is occurring.

1. EMPLOYER AGAINST WHOM CHARGE IS BROUGHT

a. Name of Employer Starbucks Corporation		b. Telephone No. (b) (6), (b) (7)(C)
		c. Certificate No.
		f. Fax No.
d. Address (Street, city, state, and ZIP code) 2401 Utah Avenue South, Suite 800 Seattle, WA 98134 130 E. Seneca St., Ithaca, NY 14850	e. Employer Representative Howard Schultz, CEO (See attached for District Managers)	g. e-mail (b) (6), (b) (7)(C) @starbucks.com
		h. Number of workers employed 20
i. Type of Establishment (factory, mine, wholesaler, etc.) Coffee Shop	j. Identify principal product or service Food and beverage	

The above-named employer has engaged in and is engaging in unfair labor practices within the meaning of section 8(a), subsections (1) and (list subsections) (3); (5) of the National Labor Relations Act, and these unfair labor practices are practices affecting commerce within the meaning of the Act, or these unfair labor practices are practices affecting commerce within the meaning of the Act and the Postal Reorganization Act.

2. Basis of the Charge (set forth a clear and concise statement of the facts constituting the alleged unfair labor practices)

See Attached

3. Full name of party filing charge (if labor organization, give full name, including local name and number)

Workers United

4a. Address (Street and number, city, state, and ZIP code) 2954 Main Street, Suite 556 Buffalo, NY 14214	4b. Telephone No. 585-473-3280
	4c. Certificate No.
	4d. Fax No.
	4e. e-mail gbonadonnajr@rrjb.org

5. Full name of national or international labor organization of which it is an affiliate or constituent (to be filled in when charge is filed by a labor organization)

Workers United, a/w SEIU

6. DECLARATION

I declare that I have read the above charge and that the statements
are true to the best of my knowledge and belief.

/s/ Michael Dolce

Michael Dolce, Attorney

(signature of representative or person making charge)

(Print/type name and title or office if any)

Hayes Dolce, 471 Voorhees Ave, Buffalo, NY 14216

May 10, 2022

Address

Date

Telephone No.
716-912-3480

Office, if any, Certificate No.

Fax No.

e-mail
mdolce@hayesdolce.com

**WILLFUL FALSE STATEMENTS ON THIS CHARGE CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001)
PRIVACY ACT STATEMENT**

Solicitation of the information on this form is authorized by the National Labor Relations Act (NLRA) 29 U.S.C. § 151 et seq. The principal use of the information is to assist the National Labor Relations Board (NLRB) in processing unfair labor practice and related proceedings or litigation. The routine uses for the information are fully set forth in the Federal Register 71 Fed. Reg. 74942-43 (Dec. 13, 2006). The NLRB will further explain these uses upon request. Disclosure of this information to the NLRB is voluntary; however, failure to supply the information may cause the NLRB to decline to invoke its processes.

Attachment to Charge Against Employer

Section 1.e - Employer Representatives

(b) (6), (b) (7)(C)

@starbucks.com

Section 2 – Basis of Charge

The above-named Employer, by its officers, agents and representatives, has interfered with, restrained, and coerced employees in the exercise of their rights as guaranteed in Section 7 of the Act, by acts and conduct including the following:

- Since about November 2022 and continuing to present, by engaging in surveillance of employees and creating the impression of surveillance by stationing multiple “support managers” at the Meadows store;
- Since about November 2022 and continuing to present, creating the impression of surveillance and engaging in surveillance by scheduling managers at the Meadows store during additional operating hours;
- Since about November 2022 and continuing to present, by creating the impression of surveillance and intimidating employees by having high-ranking corporate officials repeatedly visit the Meadows store;
- Since about November 2022 and continuing to present, by interrogating and otherwise intimidating Union supporters at the Meadows store;
- Since about March 2022 and continuing to April 2022, by holding mandatory or effectively mandatory captive audience meetings;
- Since about January 2022 and continuing to April 2022, by threatening employees with the loss of benefits if they chose to unionize;
- Since about November 2022 and continuing to April 2022, by soliciting employee grievances in response to organizing activity;
- Since about November 2022 and continuing to April 2022, by promising employees benefits in response to organizing activity and employee grievances;
- In about November 2022, by promising employees free parking outside the store in response to organizing activity and employee grievances;
- Since about November 2022 and continuing to April 2022, by granting benefits in response to organizing activity and employee grievances;
- In about November 2022 and continuing to present, by shutting down and temporarily closing the Commons store in response to organizing activity;
- In about December 2022, by improving equipment and facilities at the Commons store in response to organizing activity and employee grievances;
- In about November 2022 and continuing to present, by changing where and how trainees in the Ithaca area are trained;
- In about January, by altering shift supervisors’ playcalling responsibilities;
- In about February 2022 and continuing to present, by discriminatorily enforcing its dress code policy against union supporters;

- In about February 2022 and continuing to present, by cutting the hours of employees in response to union activity;
- In about March 2022 and continuing to present, by reducing staff scheduled to work;
- In about April 2022 and continuing to present, by recruiting and hiring new employees while cutting existing employees' hours in response to union activity;
- In about March 2022 and continuing to present, by discriminatorily enforcing its "pin" policy to exclude union paraphernalia;
- Since about January 2022 and continuing to present, by removing union posters and paraphernalia from break areas and the community board in response to organizing activity.

The above-named Employer has engaged in conduct toward employees attempting to discourage union activity, including the following:

- In about February 2022, by disciplining an employee for hanging up union materials outside of the Starbucks store not on Starbucks property;
- On March 1, 2022 by disciplining and issuing a Final Written Warning to an employee in response to union activity and to discourage union activity;
- In about March 2022 and continuing to present, for cutting the hours of employees in response to union activity and to discourage union activity;
- In about March 2022 and continuing to present, for disciplining employees in response to union activity and to discourage union activity;
- In about March 2022 and continuing to present, for disciplining shift supervisors for violations of other staff;
- In about March 2022 by disciplining and issuing a Written Warning to an employee in response to union activity and to discourage union activity;
- In about April 2022 and continuing to present, for changing schedules at the last minute in response to union activity and to discourage union activity;
- In about April 2022 and continuing to present, for constructively discharging employees due to hour cuts and discriminatory enforcement of company policies.

The NLRB certified the Union as the bargaining representative of employees on April 18, 2022, following a ballot count on April 8, 2022. Despite this, the Employer did not give notice or an opportunity to bargain over the disciplines or changes in scheduling of employees, in violation of its obligations to bargain under the Act.

The Union seeks injunctive relief under Section 10(j) of the Act to prevent irreparable destruction of employee rights resulting from Starbucks' unlawful conduct.

UNITED STATES OF AMERICA
NATIONAL LABOR RELATIONS BOARD
AMENDED CHARGE AGAINST EMPLOYER**DO NOT WRITE IN THIS SPACE**Case
3-CA-295545Date Filed
6/6/2022**INSTRUCTIONS:**

File an original with NLRB Regional Director for the region in which the alleged unfair labor practice occurred or is occurring.

1. EMPLOYER AGAINST WHOM CHARGE IS BROUGHT

a. Name of Employer Starbucks Corporation		b. Telephone No. (b) (6), (b) (7)(C)
		c. Case No.
		f. Fax No.
d. Address (Street, city, state, and ZIP code) 2401 Utah Avenue South, Suite 800 Seattle, WA 98134 130 E. Seneca St., Ithaca, NY 14850	e. Employer Representative Howard Schultz, CEO (See attached for District Managers)	g. e-mail (b) (6), (b) (7)(C) @starbucks.com
		h. Number of workers employed 20
		i. Type of Establishment (factory, mine, wholesaler, etc.) Coffee Shop
j. Identify principal product or service Food and beverage		

The above-named employer has engaged in and is engaging in unfair labor practices within the meaning of section 8(a), subsections (1) and (list subsections) (3); ~~(5)~~ of the National Labor Relations Act, and these unfair labor practices are practices affecting commerce within the meaning of the Act, or these unfair labor practices are practices affecting commerce within the meaning of the Act and the Postal Reorganization Act.

2. Basis of the Charge (set forth a clear and concise statement of the facts constituting the alleged unfair labor practices)

See Attached

3. Full name of party filing charge (if labor organization, give full name, including local name and number)

Workers United

4a. Address (Street and number, city, state, and ZIP code) 2954 Main Street, Suite 556 Buffalo, NY 14214	4b. Telephone No. 585-473-3280
	4c. Case No.
	4d. Fax No.
	4e. e-mail gbonadonnajr@rrjb.org

5. Full name of national or international labor organization of which it is an affiliate or constituent (to be filled in when charge is filed by a labor organization)

Workers United, a/w SEIU

6. DECLARATION

I declare that I have read the above charge and that the statements
are true to the best of my knowledge and belief.

/s/ Michael Dolce

Michael Dolce, Attorney

(signature of representative or person making charge)

(Print/type name and title or office if any)

Hayes Dolce, 471 Voorhees Ave, Buffalo, NY 14216

Address

Date

~~May 10, 2022~~
June 3, 2022Telephone No.
716-912-3480

Office, if any, Case No.

Fax No.

e-mail
mdolce@hayesdolce.com**WILLFUL FALSE STATEMENTS ON THIS CHARGE CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001)
PRIVACY ACT STATEMENT**

Solicitation of the information on this form is authorized by the National Labor Relations Act (NLRA) 29 U.S.C. § 151 et seq. The principal use of the information is to assist the National Labor Relations Board (NLRB) in processing unfair labor practice and related proceedings or litigation. The routine uses for the information are fully set forth in the Federal Register 71 Fed. Reg. 74942-43 (Dec. 13, 2006). The NLRB will further explain these uses upon request. Disclosure of this information to the NLRB is voluntary; however, failure to supply the information may cause the NLRB to decline to invoke its processes.

Attachment to Charge Against Employer

Section 1.e - Employer Representatives

(b) (6), (b) (7)(C)

@starbucks.com

Section 2 – Basis of Charge

The above-named Employer, by its officers, agents and representatives, has interfered with, restrained, and coerced employees in the exercise of their rights as guaranteed in Section 7 of the Act, by acts and conduct including the following:

- Since about November 2022 and continuing to present, by engaging in surveillance of employees and creating the impression of surveillance by stationing multiple “support managers” at the Commons store;
- Since about November 2022 and continuing to present, creating the impression of surveillance and engaging in surveillance by scheduling managers at the Commons store during additional operating hours;
- In about November 2022 and continuing to present, by changing where and how trainees in the Ithaca area are trained;
- In about February 2022 and continuing to present, by discriminatorily enforcing its dress code policy against union supporters;
- In about February 2022 and continuing to present, by cutting the hours of employees in response to union activity;
- In about March 2022 and continuing to present, by reducing staff scheduled to work;
- In about April 2022 and continuing to present, by recruiting and hiring new employees while cutting existing employees’ hours in response to union activity;
- In about March 2022 and continuing to present, by discriminatorily enforcing its “pin” policy to exclude union paraphernalia;
- Since about January 2022 and continuing to present, by removing union posters and paraphernalia from break areas and the community board in response to organizing activity.

The above-named Employer has engaged in conduct toward employees attempting to discourage union activity, including the following:

- In about February 2022, by disciplining an employee for hanging up union materials outside of the Starbucks store not on Starbucks property;
- On March 1, 2022 by disciplining and issuing a Final Written Warning to an employee in response to union activity and to discourage union activity;
- In about March 2022 and continuing to present, for cutting the hours of employees in response to union activity and to discourage union activity;
- In about March 2022 and continuing to present, for disciplining employees in response to union activity and to discourage union activity;

- In about March 2022 and continuing to present, for disciplining shift supervisors for violations of other staff;

The Union seeks injunctive relief under Section 10(j) of the Act to prevent irreparable destruction of employee rights resulting from Starbucks' unlawful conduct.

UNITED STATES OF AMERICA
NATIONAL LABOR RELATIONS BOARD
CHARGE AGAINST EMPLOYER

DO NOT WRITE IN THIS SPACE

Case
03-CA-298904Date Filed
7/7/2022**INSTRUCTIONS:**

File an original with NLRB Regional Director for the region in which the alleged unfair labor practice occurred or is occurring.

1. EMPLOYER AGAINST WHOM CHARGE IS BROUGHT

a. Name of Employer Starbucks Corporation		(b) (6), (b) (7)(C)
		c. Cell No.
		f. Fax No.
d. Address (Street, city, state, and ZIP code) 2401 Utah Avenue South, Suite 800 Seattle, WA 98134 3220 Sheridan Drive, Amherst, NY 14226 / 3611 Delaware Ave, Buffalo, NY 14217	e. Employer Representative Howard Schultz, CEO (b) (6), (b) (7)(C) @starbucks.com	(b) (6), (b) (7)(C) @starbucks.com
		h. Number of workers employed 30
i. Type of Establishment (factory, mine, wholesaler, etc.) Coffee shop	j. Identify principal product or service Food and beverage	

The above-named employer has engaged in and is engaging in unfair labor practices within the meaning of section 8(a), subsections (1) and (list subsections) (3) (5) of the National Labor Relations Act, and these unfair labor practices are practices affecting commerce within the meaning of the Act, or these unfair labor practices are practices affecting commerce within the meaning of the Act and the Postal Reorganization Act.

2. Basis of the Charge (set forth a clear and concise statement of the facts constituting the alleged unfair labor practices)
See attached

3. Full name of party filing charge (if labor organization, give full name, including local name and number)
Workers United

4a. Address (Street and number, city, state, and ZIP code) 2954 Main Street, Suite 556 Buffalo, NY 14214	4b. Tel. No. 585-473-3280
	4c. Cell No.
	4d. Fax No.
	4e. e-mail gbonadonna jr@rjrb.org

5. Full name of national or international labor organization of which it is an affiliate or constituent unit (to be filled in when charge is filed by a labor organization)
Workers United, a/w SEIU

6. DECLARATION

I declare that I have read the above charge and that the statements
are true to the best of my knowledge and belief.

Ian Hayes, Attorney

(signature of representative of person making charge)

(Print/type name and title or office, if any)

Tel. No.
716-608-3427

Office, if any, Cell No.

Fax No.

e-mail
ihayes@hayesdolce.com

Hayes Dolce

Address 135 Delaware Ave., Ste 502, Buffalo, NY 14202

Date July 7, 2022

**WILLFUL FALSE STATEMENTS ON THIS CHARGE CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001)
PRIVACY ACT STATEMENT**

Solicitation of the information on this form is authorized by the National Labor Relations Act (NLRA), 29 U.S.C. § 151 et seq. The principal use of the information is to assist the National Labor Relations Board (NLRB) in processing unfair labor practice and related proceedings or litigation. The routine uses for the information are fully set forth in the Federal Register, 71 Fed. Reg. 74942-43 (Dec. 13, 2006). The NLRB will further explain these uses upon request. Disclosure of this information to the NLRB is voluntary; however, failure to supply the information may cause the NLRB to decline to invoke its processes.

Attachment to Charge Against Employer

Section 2

In the past six months, the above-named Employer, by its officers, agents, and representatives, has interfered with, restrained, and coerced employees in the exercise of their rights as guaranteed in Section 7 of the Act and engaged in conduct toward employees attempting to discourage union activity, by acts and conduct including the following:

Employees currently assigned to the store at 3611 Delaware Ave, Buffalo, NY 14217 voted to be represented by the Union, and the Union was certified as their representative on March 17, 2022. The employees are temporarily assigned there pursuant to an effects bargaining agreement the parties made.

Representatives of the Employer, including (b) (6), (b) ((b) (6), (b) (7)(C)) have engaged in coercive and retaliatory activity, including threatening to discipline employees, penalizing employees by sending them home early, refusing to make minor necessary adjustments to everyday operations, among other conduct. This activity violates the parties effects bargaining agreement and the Act.

The Union seeks expedited injunctive relief under Section 10(j) of the Act to prevent irreparable destruction of employee rights.

UNITED STATES OF AMERICA
NATIONAL LABOR RELATIONS BOARD
CHARGE AGAINST EMPLOYER**DO NOT WRITE IN THIS SPACE**

Case

3-CA-299016

Date Filed

July 11, 2022

INSTRUCTIONS:

File an original with NLRB Regional Director for the region in which the alleged unfair labor practice occurred or is occurring.

1. EMPLOYER AGAINST WHOM CHARGE IS BROUGHT

a. Name of Employer Starbucks Corporation		b. Telephone No. (b) (6), (b) (7)(C)
		c. Certificate No.
		f. Fax No.
d. Address (Street, city, state, and ZIP code) 2401 Utah Avenue South, Suite 800 1210 Troy Schenectady Road, Latham, NY 12110	e. Employer Representative Howard Schultz, CEO (See attached for District Managers)	g. e-mail (b) (6), (b) (7)(C)@starbucks.com
		h. Number of workers employed 20
i. Type of Establishment (factory, mine, wholesaler, etc.) Coffee shop	j. Identify principal product or service Food and beverage	

The above-named employer has engaged in and is engaging in unfair labor practices within the meaning of section 8(a), subsections (1) and (list subsections) (3) of the National Labor Relations Act, and these unfair labor practices are practices affecting commerce within the meaning of the Act, or these unfair labor practices are practices affecting commerce within the meaning of the Act and the Postal Reorganization Act.

2. Basis of the Charge (set forth a clear and concise statement of the facts constituting the alleged unfair labor practices)

In the past six months, the above-named Employer, by its officers, agents and representatives, has interfered with, restrained, and coerced employees in the exercise of their rights as guaranteed in Section 7 of the Act, by acts and conduct including: On or about (b) (6), (b) (7)(C), 2022, disciplining (b) (6), (b) (7)(C) with a Final Written Warning for engaging in protected concerted activities and to discourage union activity.

3. Full name of party filing charge (if labor organization, give full name, including local name and number)
Workers United

4a. Address (Street and number, city, state, and ZIP code) 2954 Main Street, Suite 556 Buffalo, NY 14214	4b. Telephone No. 585-473-3280
	4c. Certificate No.
	4d. Fax No.
	4e. e-mail gbonadonnajr@rrjb.org

5. Full name of national or international labor organization of which it is an affiliate or constituent (to be filled in when charge is filed by a labor organization)
Workers United**6. DECLARATION**

I declare that I have read the above charge and that the statements
are true to the best of my knowledge and belief.

/s/ Michael Dolce

Michael Dolce, Attorney

(signature of representative or person making charge)

(Print/type name and title or office if any)

135 Delaware Ave., Ste. 502, Buffalo, NY 14202

July 9, 2022

Address

Date

Telephone No.
716-912-3480

Office, if any, Certificate No.

Fax No.

e-mail
mdolce@hayesdolce.com**WILLFUL FALSE STATEMENTS ON THIS CHARGE CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001)
PRIVACY ACT STATEMENT**

Solicitation of the information on this form is authorized by the National Labor Relations Act (NLRA) 29 U.S.C. § 151 et seq. The principal use of the information is to assist the National Labor Relations Board (NLRB) in processing unfair labor practice and related proceedings or litigation. The routine uses for the information are fully set forth in the Federal Register 71 Fed. Reg. 74942-43 (Dec. 13, 2006). The NLRB will further explain these uses upon request. Disclosure of this information to the NLRB is voluntary; however, failure to supply the information may cause the NLRB to decline to invoke its processes.

UNITED STATES OF AMERICA
NATIONAL LABOR RELATIONS BOARD
Amended CHARGE AGAINST EMPLOYER

DO NOT WRITE IN THIS SPACE	
Case 3-CA-299016	Date Filed 7/28/2022

INSTRUCTIONS:

File an original with NLRB Regional Director for the region in which the alleged unfair labor practice occurred or is occurring.

1. EMPLOYER AGAINST WHOM CHARGE IS BROUGHT

a. Name of Employer Starbucks Corporation		b. Telephone No. (b) (6), (b) (7)(C)
		c. Cell Phone No.
		f. Fax No.
d. Address (Street, city, state, and ZIP code) 2401 Utah Avenue South, Suite 800 1210 Troy Schenectady Road, Latham, NY 12110	e. Employer Representative Howard Schultz, CEO See Attachment for District Manager	g. e-mail (b) (6), (b) (7)(C) @starbucks.com
		h. Number of workers employed 20
		i. Type of Establishment (factory, mine, wholesaler, etc.) Coffee shop
j. Identify principal product or service Food and beverage		

The above-named employer has engaged in and is engaging in unfair labor practices within the meaning of section 8(a), subsections (1) and (list subsections) (3); (5) of the National Labor Relations Act, and these unfair labor practices are practices affecting commerce within the meaning of the Act, or these unfair labor practices are practices affecting commerce within the meaning of the Act and the Postal Reorganization Act.

2. Basis of the Charge (set forth a clear and concise statement of the facts constituting the alleged unfair labor practices)

See Attachment

3. Full name of party filing charge (if labor organization, give full name, including local name and number)
Workers United

4a. Address (Street and number, city, state, and ZIP code) 2954 Main Street, Suite 556 Buffalo, NY 14214	4b. Telephone No. 585-473-3280
	4c. Cell Phone No.
	4d. Fax No.
	4e. e-mail gbonadonnajr@rrjb.org

5. Full name of national or international labor organization of which it is an affiliate or constituent (to be filled in when charge is filed by a labor organization)
Workers United**6. DECLARATION**

I declare that I have read the above charge and that the statements
are true to the best of my knowledge and belief.

/s/ Michael Dolce

Michael Dolce, Attorney

(signature of representative or person making charge)

(Print/type name and title or office if any)

135 Delaware Ave., Ste. 502, Buffalo, NY 14202

July 21, 2022

Address

Date

Telephone No.
716-912-3480

Office, if any, Cell Phone No.

Fax No.

e-mail
mdolce@hayesdolce.com**WILLFUL FALSE STATEMENTS ON THIS CHARGE CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001)
PRIVACY ACT STATEMENT**

Solicitation of the information on this form is authorized by the National Labor Relations Act (NLRA) 29 U.S.C. § 151 et seq. The principal use of the information is to assist the National Labor Relations Board (NLRB) in processing unfair labor practice and related proceedings or litigation. The routine uses for the information are fully set forth in the Federal Register 71 Fed. Reg. 74942-43 (Dec. 13, 2006). The NLRB will further explain these uses upon request. Disclosure of this information to the NLRB is voluntary; however, failure to supply the information may cause the NLRB to decline to invoke its processes.

Attachment to Charge Against Employer

Section 1.e - Employer Representatives

(b) (6), (b) (7)(C)

[starbucks.com](https://www.starbucks.com)

Section 2 – Basis of Charge

The above-named Employer, by its officers, agents and representatives, has interfered with, restrained, and coerced employees in the exercise of their rights as guaranteed in Section 7 of the Act, by acts and conduct including the following:

- On or about (b) (6), (b) (7)(C), 2022, by denying (b) (6), (b) (7)(C) (b) (6), (b) (7)(C) *Weingarten* rights during an investigatory interview;
- On or about (b) (6), (b) (7)(C), 2022, by denying (b) (6), (b) (7)(C) (b) (6), (b) (7)(C) *Weingarten* rights during an investigatory interview;
- In or about June 2022, by creating the impression of surveillance by monitoring a private group chat of the store's organizing committee.

The above-named Employer has engaged in conduct toward employees attempting to discourage union activity, including the following:

- On or about (b) (6), (b) (7)(C), 2022, by disciplining (b) (6), (b) (7)(C) for engaging in protected concerted activities and to discourage union activity.

The NLRB certified the Union as the bargaining representative of employees in May 2022. Despite this, the Employer did not give notice or an opportunity to bargain in violation of its obligations to bargain under the Act, including:

- In or about June 2022, by failing to bargain over the decision to temporarily close the store, and the effects of such a decision;
- In or about (b) (6), (b) (7)(C) 2022, by failing to bargain over the discipline of (b) (6), (b) (7)(C), and the effects of such discipline;
- In or about (b) (6), (b) (7)(C) 2022, by failing to bargain over the discipline of (b) (6), (b) (7)(C), and the effects of such discipline.

UNITED STATES OF AMERICA
NATIONAL LABOR RELATIONS BOARD
CHARGE AGAINST EMPLOYER

DO NOT WRITE IN THIS SPACE	
Case 03-CA-299016	Date Filed 7/28/2022

INSTRUCTIONS:

File an original with NLRB Regional Director for the region in which the alleged unfair labor practice occurred or is occurring.

1. EMPLOYER AGAINST WHOM CHARGE IS BROUGHT	
a. Name of Employer Starbucks Corporation	b. Te. No. (b) (6), (b) (7)(C)
	c. Ce. No.
	f. Fax. No.
d. Address (Street, city, state, and ZIP code) 2401 Utah Avenue South, Suite 800 1210 Troy Schenectady Road, Latham, NY 12110	e. Employer Representative Howard Schultz, CEO See Attachment for District Manager
	g. e-mail (b) (6), (b) (7)(C)@starbucks.com
	h. Number of workers employed 20
i. Type of Establishment (factory, mine, wholesaler, etc.) Coffee shop	j. Identify principal product or service Food and beverage
The above-named employer has engaged in and is engaging in unfair labor practices within the meaning of section 8(a), subsections (1) and (list subsections) (3); (5) of the National Labor Relations Act, and these unfair labor practices are practices affecting commerce within the meaning of the Act, or these unfair labor practices are practices affecting commerce within the meaning of the Act and the Postal Reorganization Act.	
2. Basis of the Charge (set forth a clear and concise statement of the facts constituting the alleged unfair labor practices) See Attachment	
3. Full name of party filing charge (if labor organization, give full name, including local name and number) Workers United	
4a. Address (Street and number, city, state, and ZIP code) 2954 Main Street, Suite 556 Buffalo, NY 14214	4b. Te. No. 585-473-3280
	4c. Ce. No.
	4d. Fax No.
	4e. e-mail gbonadonna jr@nrlb.org
5. Full name of national or international labor organization of which this is an affiliate or constituent unit (to be filled in when charge is filed by a labor organization) Workers United	
6. DECLARATION I declare that I have read the above charge and that the statements are true to the best of my knowledge and belief. /s/ Michael Dolce Michael Dolce, Attorney (signature of representative or person making charge) (Print/type name and title or office if any)	
Te. No. 716-912-3480	
Office, if any, Ce. No.	
Fax No.	
e-mail mdolce@hayesdolce.com	
135 Delaware Ave., Ste. 502, Buffalo, NY 14202 July 28, 2022 Address Date	

**WILLFUL FALSE STATEMENTS ON THIS CHARGE CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001)
PRIVACY ACT STATEMENT**

Solicitation of the information on this form is authorized by the National Labor Relations Act (NLRA) 29 U.S.C. § 151 et seq. The principal use of the information is to assist the National Labor Relations Board (NLRB) in processing unfair labor practice and related proceedings or litigation. The routine uses for the information are fully set forth in the Federal Register 71 Fed. Reg. 74942-43 (Dec. 13, 2006). The NLRB will further explain these uses upon request. Disclosure of this information to the NLRB is voluntary; however, failure to supply the information may cause the NLRB to decline to invoke its processes.

Attachment to Charge Against Employer

Section 1.e - Employer Representatives

(b) (6), (b) (7)(C)

@starbucks.com

Section 2 – Basis of Charge

The above-named Employer, by its officers, agents and representatives, has interfered with, restrained, and coerced employees in the exercise of their rights as guaranteed in Section 7 of the Act, by acts and conduct including the following:

- On or about (b) (6), (b) (7)(C), 2022, by denying (b) (6), (b) (7)(C) (b) (6), *Weingarten* rights during an investigatory interview;
- On or about (b) (6), (b) (7)(C), 2022, by denying (b) (6), (b) (7)(C) (b) (6), *Weingarten* rights during an investigatory interview;
- In or about June 2022, by creating the impression of surveillance by monitoring a private group chat of the store's organizing committee.

The above-named Employer has engaged in conduct toward employees attempting to discourage union activity, including the following:

- On or about (b) (6), (b) (7)(C), 2022, by disciplining (b) (6), (b) (7)(C) with a Final Written Warning for engaging in protected concerted activities and to discourage union activity.
- On or about (b) (6), (b) (7)(C), 2022, by disciplining (b) (6), (b) (7)(C) for engaging in protected concerted activities and to discourage union activity.

The NLRB certified the Union as the bargaining representative of employees in May 2022. Despite this, the Employer did not give notice or an opportunity to bargain in violation of its obligations to bargain under the Act, including:

- In or about June 2022, by failing to bargain over the decision to temporarily close the store, and the effects of such a decision;
- In or about (b) (6), (b) (7)(C) 2022, by failing to bargain over the discipline of (b) (6), (b) (7)(C), and the effects of such discipline;
- In or about (b) (6), (b) (7)(C) 2022, by failing to bargain over the discipline of (b) (6), (b) (7)(C), and the effects of such discipline.

UNITED STATES OF AMERICA
NATIONAL LABOR RELATIONS BOARD
CHARGE AGAINST EMPLOYER

DO NOT WRITE IN THIS SPACE	
Case 3-CA-299540	Date Filed 7/18/2022

INSTRUCTIONS:

File an original with NLRB Regional Director for the region in which the alleged unfair labor practice occurred or is occurring.

1. EMPLOYER AGAINST WHOM CHARGE IS BROUGHT			
a. Name of Employer Starbucks Corporation		b. Telephone No. (b) (6), (b) (7)(C)	
		c. Case No.	
		f. Fax No.	
d. Address (Street, city, state, and ZIP code) 2401 Utah Avenue South, Suite 800 402 College Ave, Ste 402, Ithaca, NY 14850		e. Employer Representative Howard Schultz, CEO See Attachment for District Manager	
		g. e-mail (b) (6), (b) (7)(C) @starbucks.com	
		h. Number of workers employed 20	
i. Type of Establishment (factory, mine, wholesaler, etc.) Coffee shop		j. Identify principal product or service Food and beverage	
The above-named employer has engaged in and is engaging in unfair labor practices within the meaning of section 8(a), subsections (1) and (list subsections) (3); (5) of the National Labor Relations Act, and these unfair labor practices are practices affecting commerce within the meaning of the Act, or these unfair labor practices are practices affecting commerce within the meaning of the Act and the Postal Reorganization Act.			
2. Basis of the Charge (set forth a clear and concise statement of the facts constituting the alleged unfair labor practices) See Attachment			
3. Full name of party filing charge (if labor organization, give full name, including local name and number) Workers United			
4a. Address (Street and number, city, state, and ZIP code) 2954 Main Street, Suite 556 Buffalo, NY 14214		4b. Telephone No. 585-473-3280	
		4c. Case No.	
		4d. Fax No.	
		4e. e-mail gbonadonnajr@rrjb.org	
5. Full name of national or international labor organization of which it is an affiliate or constituent (to be filled in when charge is filed by a labor organization) Workers United			
6. DECLARATION I declare that I have read the above charge and that the statements are true to the best of my knowledge and belief. /s/ Michael Dolce <hr/> (signature of representative or person making charge)		Michael Dolce, Attorney <hr/> (Print/type name and title or office if any)	
135 Delaware Ave., Ste. 502, Buffalo, NY 14202 Address		July 18, 2022 Date	
		Telephone No. 716-912-3480	
		Office, if any, Case No.	
		Fax No.	
		e-mail mdolce@hayesdolce.com	

**WILLFUL FALSE STATEMENTS ON THIS CHARGE CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001)
PRIVACY ACT STATEMENT**

Solicitation of the information on this form is authorized by the National Labor Relations Act (NLRA) 29 U.S.C. § 151 et seq. The principal use of the information is to assist the National Labor Relations Board (NLRB) in processing unfair labor practice and related proceedings or litigation. The routine uses for the information are fully set forth in the Federal Register 71 Fed. Reg. 74942-43 (Dec. 13, 2006). The NLRB will further explain these uses upon request. Disclosure of this information to the NLRB is voluntary; however, failure to supply the information may cause the NLRB to decline to invoke its processes.

Attachment to Charge Against Employer

Section 1.e - Employer Representatives

(b) (6), (b) (7)(C)

[starbucks.com](https://www.starbucks.com)

Section 2 – Basis of Charge

The above-named Employer, by its officers, agents and representatives, has interfered with, restrained, and coerced employees in the exercise of their rights as guaranteed in Section 7 of the Act, and has engaged in conduct toward employees attempting to discourage union activity, by acts and conduct including the following:

- In (b) (6), (b) (7)(C) 2022, by altering the terms and conditions of employment, and thereby constructively discharging (b) (6), (b) (7)(C);
- In (b) (6), (b) (7)(C) 2022, by not granting a previously granted accommodation, disciplining, and thereby constructively discharging (b) (6), (b) (7)(C);
- In (b) (6), (b) (7)(C) 2022, by not granting a previously granted accommodation, denying an LOA request, and thereby constructively discharging (b) (6), (b) (7)(C);
- In (b) (6), (b) (7)(C) 2022, by failing to grant a previously granted accommodation, and thereby constructively discharging (b) (6), (b) (7)(C);
- In (b) (6), (b) (7)(C) 2022, by failing to grant a previously granted accommodation, and thereby constructively discharging (b) (6), (b) (7)(C);
- In (b) (6), (b) (7)(C) 2022, by failing to grant a previously granted accommodation, and thereby constructively discharging (b) (6), (b) (7)(C);
- In (b) (6), (b) (7)(C) 2022, by altering the terms and conditions of employment, and thereby constructively discharging (b) (6), (b) (7)(C).

The NLRB certified the Union as the bargaining representative of employees on April 18, 2022, following a ballot count on April 8, 2022. Despite this, the Employer did not give notice or an opportunity to bargain over the disciplines, changes in scheduling of employees, nor changes in other terms and conditions of employment, in violation of its obligations to bargain under the Act.

The Union seeks injunctive relief under Section 10(j) of the Act to prevent irreparable destruction of employee rights resulting from Starbucks' unlawful conduct.

UNITED STATES OF AMERICA
NATIONAL LABOR RELATIONS BOARD
CHARGE AGAINST EMPLOYER

DO NOT WRITE IN THIS SPACE

Case
14-CA-299315Date Filed
July 13, 2022

INSTRUCTIONS:

File an original with NLRB Regional Director for the region in which the alleged unfair labor practice occurred or is occurring.

1. EMPLOYER AGAINST WHOM CHARGE IS BROUGHT

a. Name of Employer Starbucks Corporation		b. Te. No. (b) (6), (b) (7)(C)
		c. Ce. No.
		f. Fax No.
d. Address (Street, city, state, and ZIP code) 2401 Utah Avenue South, Suite 800 132 NW 23rd St., Oklahoma City, OK	e. Employer Representative Howard Schultz, CEO (b) (6), (b) (7)(C) @starbucks.com)	g. e-mail (b) (6), (b) (7)(C) @starbucks.com
		h. Number of workers employed 33
i. Type of Establishment (factory, mine, wholesaler, etc.) Coffee shop		j. Identify principal product or service Food and beverage

The above-named employer has engaged in and is engaging in unfair labor practices within the meaning of section 8(a), subsections (1) and (list subsections) (5) of the National Labor Relations Act, and these unfair labor practices are practices affecting commerce within the meaning of the Act, or these unfair labor practices are practices affecting commerce within the meaning of the Act and the Postal Reorganization Act.

2. Basis of the Charge (set forth a clear and concise statement of the facts constituting the alleged unfair labor practices)

The NLRB certified the Union as the bargaining representative of employees in May 2022. Despite this, the Employer did not give notice or an opportunity to bargain over an announced change to the store's Time and Attendance Policy and call-in policy, both of which were announced in June 2022 and went into effect June 20, 2022, in violation of the Employer's obligations to bargain under the Act. The Employer has also refused to bargain over the effects of implementing such changes in policies. The Employer also threatened a Union representative in or around July 12, 2022, claiming that the duty to bargain does not extend to "policies" and only to "wages and benefits" and that the Employer would not bargain over anything for at least a year.

3. Full name of party filing charge (if labor organization, give full name, including local name and number)
Workers United

4a. Address (Street and number, city, state, and ZIP code) 22 South 22nd St, Philadelphia PA 16103	4b. Te. No. 646 448 6414
	4c. Ce. No.
	4d. Fax No.
	4e. e-mail rminter@pjbwu.org

5. Full name of national or international labor organization of which this is an affiliate or constituent unit (to be filled in when charge is filed by a labor organization)
Workers United, a/w SEIU

6. DECLARATION

I declare that I have read the above charge and that the statements
are true to the best of my knowledge and belief.

/s/ Michael Dolce

Michael Dolce, Attorney

(signature of representative or person making charge)

(Print/type name and title or office if any)

135 Delaware Ave., Ste. 502, Buffalo, NY 14202

July 13, 2022

Address

Date

Te. No.
716-912-3480

Office, if any, Ce. No.

Fax No.

e-mail
mdolce@hayesdolce.comWILLFUL FALSE STATEMENTS ON THIS CHARGE CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001)
PRIVACY ACT STATEMENT

Solicitation of the information on this form is authorized by the National Labor Relations Act (NLRA) 29 U.S.C. § 151 et seq. The principal use of the information is to assist the National Labor Relations Board (NLRB) in processing unfair labor practice and related proceedings or litigation. The routine uses for the information are fully set forth in the Federal Register 71 Fed. Reg. 74942-43 (Dec. 13, 2006). The NLRB will further explain these uses upon request. Disclosure of this information to the NLRB is voluntary; however, failure to supply the information may cause the NLRB to decline to invoke its processes.

UNITED STATES OF AMERICA
NATIONAL LABOR RELATIONS BOARD
CHARGE AGAINST EMPLOYER

DO NOT WRITE IN THIS SPACE	
Case 14-CA-300070	Date Filed July 25, 2022

INSTRUCTIONS:

File an original with NLRB Regional Director for the region in which the alleged unfair labor practice occurred or is occurring.

1. EMPLOYER AGAINST WHOM CHARGE IS BROUGHT

a. Name of Employer Starbucks Corporation		(b) (6), (b) (7)(C)
		c. Cell No.
		f. Fax No.
d. Address (Street, city, state, and ZIP code) 2401 Utah Avenue South, Suite 800 3616 N May Avenue Oklahoma City, OK 73112	e. Employer Representative Howard Schultz, President and CEO (see attached for (b) (6), (b) (7)(C))	(b) (6), (b) (7)(C) @starbucks.com
		h. Number of workers employed 28
i. Type of Establishment (factory, mine, wholesaler, etc.) retail	j. Identify principal product or service coffee	

The above-named employer has engaged in and is engaging in unfair labor practices within the meaning of section 8(a), subsections (1) and (list subsections) (5) of the National Labor Relations Act, and these unfair labor practices are practices affecting commerce within the meaning of the Act, or these unfair labor practices are practices affecting commerce within the meaning of the Act and the Postal Reorganization Act.

2. Basis of the Charge (set forth a clear and concise statement of the facts constituting the alleged unfair labor practices)

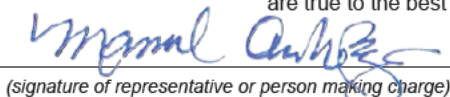
The NLRB certified the Union as the bargaining representative of employees in June 2022. The union requested bargaining over health & safety aspects of upcoming remodeling work, as well as over employee staffing during the remodeling. Finally, the union requested information in connection with its request to bargain. Despite the approaching remodeling work, the company has not responded to the request to bargain or for information, in violation of the Employer's obligations to bargain under the Act.

3. Full name of party filing charge (if labor organization, give full name, including local name and number)
Workers United

4a. Address (Street and number, city, state, and ZIP code) 22 South 22nd St, Philadelphia PA 16103	4b. Tel. No. 646 448 6414
	4c. Cell No.
	4d. Fax No.
	4e. e-mail rminter@pjbwu.org

5. Full name of national or international labor organization of which it is an affiliate or constituent unit (to be filled in when charge is filed by a labor organization)
SEIU**6. DECLARATION**

I declare that I have read the above charge and that the statements
are true to the best of my knowledge and belief.


(signature of representative or person making charge)

Manuel Quinto-Pozos, Attorney

(Print/type name and title or office, if any)

Tel. No.
(512) 474-6200

Office, if any, Cell No.

Fax No.
(512) 474-7896e-mail
mqp@ddollaw.com

Address 707 W. 34th St., Suite 3, Austin, TX 78705

Date Jul 25, 2022

**WILLFUL FALSE STATEMENTS ON THIS CHARGE CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001)
PRIVACY ACT STATEMENT**

Solicitation of the information on this form is authorized by the National Labor Relations Act (NLRA), 29 U.S.C. § 151 *et seq.* The principal use of the information is to assist the National Labor Relations Board (NLRB) in processing unfair labor practice and related proceedings or litigation. The routine uses for the information are fully set forth in the Federal Register, 71 Fed. Reg. 74942-43 (Dec. 13, 2006). The NLRB will further explain these uses upon request. Disclosure of this information to the NLRB is voluntary; however, failure to supply the information may cause the NLRB to decline to invoke its processes.

UNITED STATES OF AMERICA
NATIONAL LABOR RELATIONS BOARD
CHARGE AGAINST EMPLOYER

DO NOT WRITE IN THIS SPACE	
Case 19-CA-296424	Date Filed 5/24/2022

INSTRUCTIONS:

File an original with NLRB Regional Director for the region in which the alleged unfair labor practice occurred or is occurring.

1. EMPLOYER AGAINST WHOM CHARGE IS BROUGHT

a. Name of Employer Starbucks Corporation		b. Tel. No. (b) (6), (b) (7)(C)
		c. Cell No.
		f. Fax No.
d. Address (Street, city, state, and ZIP code) 2401 Utah Avenue, Suite 800 Seattle, WA 98134	e. Employer Representative Howard Schultz, CEO	g. e-mail (b) (6), (b) (7)(C) @starbucks.com
		h. Number of workers employed Approx. 20
i. Type of Establishment (factory, mine, wholesaler, etc.) Coffee Shop	j. Identify principal product or service Food and Beverage	

The above-named employer has engaged in and is engaging in unfair labor practices within the meaning of section 8(a), subsections (1) and (5) of the National Labor Relations Act, and these unfair labor practices are practices affecting commerce within the meaning of the Act and the Postal Reorganization Act.

2. Basis of the Charge (set forth a clear and concise statement of the facts constituting the alleged unfair labor practices)

Within the past six months, the Employer has refused to provide and/or improperly delayed providing information requested by the Union that is reasonably necessary in order for the Union to engage in first-contract bargaining with the Employer.

3. Full name of party filing charge (if labor organization, give full name, including local name and number)

Workers United

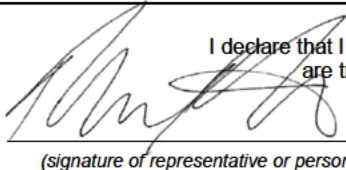
4a. Address (Street and number, city, state, and ZIP code) Workers United 22 South 22 nd St Philadelphia, PA 19103	4b. Tel. No. (646) 448-6414
	4c. Cell No.
	4d. Fax No. (215) 575-9065
	4e. e-mail rminter@pjbwu.org

5. Full name of national or international labor organization of which it is an affiliate or constituent unit (to be filled in when charge is filed by a labor organization)

Service Employees International Union

6. DECLARATION

I declare that I have read the above charge and that the statements are true to the best of my knowledge and belief.



(signature of representative or person making charge)

Marina Multhaup, Attorney

(Print/type name and title or office, if any)

Barnard Iglitzin & Lavitt LLP
18 West Mercer St., Ste. 400
Address Seattle, WA 98119

Date 5/24/2022

Tel. No. (206) 257-6001
Office, if any, Cell No.
Fax No. (206) 378-4132
e-mail multhaup@workerlaw.com

WILLFUL FALSE STATEMENTS ON THIS CHARGE CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001)
PRIVACY ACT STATEMENT

Solicitation of the information on this form is authorized by the National Labor Relations Act (NLRA), 29 U.S.C. § 151 et seq. The principal use of the information is to assist the National Labor Relations Board (NLRB) in processing unfair labor practice and related proceedings or litigation. The routine uses for the information are fully set forth in the Federal Register, 71 Fed. Reg. 74942-43 (Dec. 13, 2006). The NLRB will further explain these uses upon request. Disclosure of this information to the NLRB is voluntary; however, failure to supply the information may cause the NLRB to decline to invoke its processes.

UNITED STATES OF AMERICA
NATIONAL LABOR RELATIONS BOARD
**FIRST AMENDED CHARGE
AGAINST EMPLOYER**

DO NOT WRITE IN THIS SPACE	
Case 19-CA-296424	Date Filed 6/2/2022

INSTRUCTIONS:

File an original with NLRB Regional Director for the region in which the alleged unfair labor practice occurred or is occurring.

1. EMPLOYER AGAINST WHOM CHARGE IS BROUGHT

a. Name of Employer Starbucks Corporation		b. Tel. No. (b) (6), (b) (7)(C)
		c. Cell No.
		f. Fax No.
d. Address (Street, city, state, and ZIP code) 2401 Utah Avenue, Suite 800 Seattle, WA 98134	e. Employer Representative Howard Schultz, CEO	g. e-mail (b) (6), (b) (7)(C) @starbucks.com
		h. Number of workers employed Approx. 20
i. Type of Establishment (factory, mine, wholesaler, etc.) Coffee Shop	j. Identify principal product or service Food and Beverage	

The above-named employer has engaged in and is engaging in unfair labor practices within the meaning of section 8(a), subsections (1) and (5) of the National Labor Relations Act, and these unfair labor practices are practices affecting commerce within the meaning of the Act, or these unfair labor practices are practices affecting commerce within the meaning of the Act and the Postal Reorganization Act.

2. Basis of the Charge (set forth a clear and concise statement of the facts constituting the alleged unfair labor practices)

Within the past six months, the Employer has refused to provide and/or improperly delayed providing information requested by the Union that is reasonably necessary in order for the Union to engage in first-contract bargaining with the Employer. In addition, the Employer has not responded to the Union's request for bargaining dates making it impossible to begin bargaining a contract.

3. Full name of party filing charge (if labor organization, give full name, including local name and number)

Workers United

4a. Address (Street and number, city, state, and ZIP code)Workers United
22 South 22nd St
Philadelphia, PA 19103**4b. Tel. No.**

(646) 448-6414

4c. Cell No.**4d. Fax No.**

(215) 575-9065

4e. e-mail

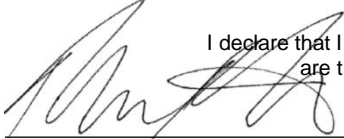
rminter@pjbwu.org

5. Full name of national or international labor organization of which it is an affiliate or constituent unit (to be filled in when charge is filed by a labor organization)

Service Employees International Union

6. DECLARATION

I declare that I have read the above charge and that the statements
are true to the best of my knowledge and belief.



(signature of representative or person making charge)

Marina Multhaup, Attorney

(Print/type name and title or office, if any)

Barnard Iglitzin & Lavitt LLP
18 West Mercer St., Ste. 400

Address Seattle, WA 98119

Date 6/2/2022

Tel. No.

(206) 257-6001

Office, if any, Cell No.**Fax No.**

(206) 378-4132

e-mail

multhaup@workerlaw.com

WILLFUL FALSE STATEMENTS ON THIS CHARGE CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001)
PRIVACY ACT STATEMENT

Solicitation of the information on this form is authorized by the National Labor Relations Act (NLRA), 29 U.S.C. § 151 et seq. The principal use of the information is to assist the National Labor Relations Board (NLRB) in processing unfair labor practice and related proceedings or litigation. The routine uses for the information are fully set forth in the Federal Register, 71 Fed. Reg. 74942-43 (Dec. 13, 2006). The NLRB will further explain these uses upon request. Disclosure of this information to the NLRB is voluntary; however, failure to supply the information may cause the NLRB to decline to invoke its processes.

UNITED STATES OF AMERICA
NATIONAL LABOR RELATIONS BOARD
**SECOND AMENDED CHARGE
AGAINST EMPLOYER****DO NOT WRITE IN THIS SPACE**Case
19-CA-296424Date Filed
6/7/2022**INSTRUCTIONS:**

File an original with NLRB Regional Director for the region in which the alleged unfair labor practice occurred or is occurring.

1. EMPLOYER AGAINST WHOM CHARGE IS BROUGHT

a. Name of Employer Starbucks Corporation		b. Tel. No. (b) (6), (b) (7)(C)
		c. Cell No.
		f. Fax No.
d. Address (Street, city, state, and ZIP code) 2401 Utah Avenue, Suite 800 Seattle, WA 98134	e. Employer Representative Howard Schultz, CEO	g. e-mail (b) (6), (b) (7)(C) @starbucks.com
i. Type of Establishment (factory, mine, wholesaler, etc.) Coffee Shop		j. Identify principal product or service Food and Beverage

The above-named employer has engaged in and is engaging in unfair labor practices within the meaning of section 8(a), subsections (1) and (5) of the National Labor Relations Act, and these unfair labor practices are practices affecting commerce within the meaning of the Act, or these unfair labor practices are practices affecting commerce within the meaning of the Act and the Postal Reorganization Act.

2. Basis of the Charge (set forth a clear and concise statement of the facts constituting the alleged unfair labor practices)

Within the past six months, at at least one of the Union-represented stores in the Pacific Northwest, the Employer has refused to provide and/or improperly delayed providing the information requested by the Union that is reasonably necessary in order for the Union to engage in first-contract bargaining with the Employer regarding that store's represented employees. In addition, the Employer has not responded to the Union's request for bargaining dates for at least fourteen other stores in the Pacific Northwest, making it impossible to begin bargaining a contract for the workers at each of those stores

3. Full name of party filing charge (if labor organization, give full name, including local name and number)

Workers United

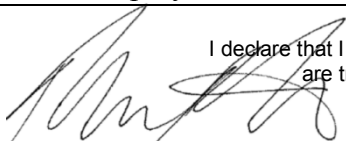
4a. Address (Street and number, city, state, and ZIP code) Workers United 22 South 22 nd St Philadelphia, PA 19103	4b. Tel. No. (646) 448-6414
	4c. Cell No.
	4d. Fax No. (215) 575-9065
	4e. e-mail rminter@pjbwu.org

5. Full name of national or international labor organization of which it is an affiliate or constituent unit (to be filled in when charge is filed by a labor organization)

Service Employees International Union

6. DECLARATION

I declare that I have read the above charge and that the statements
are true to the best of my knowledge and belief.



(signature of representative or person making charge)

Marina Multhaup, Attorney

(Print/type name and title or office, if any)

Barnard Iglitzin & Lavitt LLP
18 West Mercer St., Ste. 400
Address Seattle, WA 98119

Date 6/7/2022

Tel. No.
(206) 257-6001

Office, if any, Cell No.

Fax No.
(206) 378-4132e-mail
multhaup@workerlaw.com**WILLFUL FALSE STATEMENTS ON THIS CHARGE CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001)
PRIVACY ACT STATEMENT**

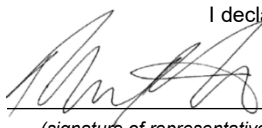
Solicitation of the information on this form is authorized by the National Labor Relations Act (NLRA), 29 U.S.C. § 151 et seq. The principal use of the information is to assist the National Labor Relations Board (NLRB) in processing unfair labor practice and related proceedings or litigation. The routine uses for the information are fully set forth in the Federal Register, 71 Fed. Reg. 74942-43 (Dec. 13, 2006). The NLRB will further explain these uses upon request. Disclosure of this information to the NLRB is voluntary; however, failure to supply the information may cause the NLRB to decline to invoke its processes.

UNITED STATES OF AMERICA
NATIONAL LABOR RELATIONS BOARD
**THIRD AMENDED CHARGE
AGAINST EMPLOYER**

DO NOT WRITE IN THIS SPACE	
Case 19-CA-296424	Date Filed 6/14/2022

INSTRUCTIONS:

File an original with NLRB Regional Director for the region in which the alleged unfair labor practice occurred or is occurring.

1. EMPLOYER AGAINST WHOM CHARGE IS BROUGHT	
a. Name of Employer Starbucks Corporation	b. Tel. No. (b) (6), (b) (7)(C)
	c. Cell No.
	f. Fax. No.
d. Address (Street, city, state, and ZIP code) 2401 Utah Avenue, Suite 800 Seattle, WA 98134	e. Employer Representative Howard Schultz, CEO
	g. e-mail (b) (6), (b) (7)(C) @starbucks.com
	h. Number of workers employed Approx. 200
i. Type of Establishment (factory, mine, wholesaler, etc.) Coffee Shop	j. Identify principal product or service Food and Beverage
The above-named employer has engaged in and is engaging in unfair labor practices within the meaning of section 8(a), subsections (1) and (5) of the National Labor Relations Act, and these unfair labor practices are practices affecting commerce within the meaning of the Act, or these unfair labor practices are practices affecting commerce within the meaning of the Act and the Postal Reorganization Act.	
2. Basis of the Charge (set forth a clear and concise statement of the facts constituting the alleged unfair labor practices) Within the past six months, at multiple Union-represented stores around the country, as part of a nationwide pattern and practice of refusing to bargain with workers who are represented by Workers United, the Employer has not responded to the Union's requests for bargaining dates and/or has failed to acknowledge the Union's demands to bargain, making it impossible to begin bargaining a contract for the workers at each of those stores. In addition, at multiple Union-represented stores around the country, the Employer has refused to provide and/or improperly delayed providing the information requested by the Union that is reasonably necessary in order for the Union to engage in first-contract bargaining with the Employer regarding that store's represented employees. The Union requests 10(j) relief in this charge.	
3. Full name of party filing charge (if labor organization, give full name, including local name and number) Workers United	
4a. Address (Street and number, city, state, and ZIP code) Workers United 22 South 22 nd St Philadelphia, PA 19103	4b. Tel. No. (646) 448-6414
	4c. Cell No.
	4d. Fax No. (215) 575-9065
	4e. e-mail rminter@pjbwu.org
5. Full name of national or international labor organization of which it is an affiliate or constituent unit (to be filled in when charge is filed by a labor organization) Service Employees International Union	
6. DECLARATION I declare that I have read the above charge and that the statements are true to the best of my knowledge and belief.  (signature of representative or person making charge) Barnard Iglitzin & Lavitt LLP 18 West Mercer St., Ste. 400 Address Seattle, WA 98119	
Marina Multhaup, Attorney (Print/type name and title or office, if any) Date 6/14/2022	
Tel. No. (206) 257-6001	
Office, if any, Cell No.	
Fax No. (206) 378-4132	
e-mail multhaup@workerlaw.com	

**WILLFUL FALSE STATEMENTS ON THIS CHARGE CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001)
PRIVACY ACT STATEMENT**

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UNITED STATES OF AMERICA
NATIONAL LABOR RELATIONS BOARD
CHARGE AGAINST EMPLOYER

DO NOT WRITE IN THIS SPACE	
Case 27-CA-297804	Date Filed 6/17/2022

INSTRUCTIONS:

File an original with NLRB Regional Director for the region in which the alleged unfair labor practice occurred or is occurring.

1. EMPLOYER AGAINST WHOM CHARGE IS BROUGHT

a. Name of Employer Starbucks Corporation		b. Tel. No. (b) (6), (b) (7)(C)
		c. Cell No.
		f. Fax No.
d. Address (Street, city, state, and ZIP code) 303 16th St., Ste. 100 Denver, CO 80202	e. Employer Representative (b) (6), (b) (7)(C)	g. e-mail
		h. Number of workers employed 25
i. Type of Establishment (factory, mine, wholesaler, etc.) Restaurant	j. Identify principal product or service Coffee	

The above-named employer has engaged in and is engaging in unfair labor practices within the meaning of section 8(a), subsections (1) and (list subsections) (3) of the National Labor Relations Act, and these unfair labor practices are practices affecting commerce within the meaning of the Act, or these unfair labor practices are practices affecting commerce within the meaning of the Act and the Postal Reorganization Act.

2. Basis of the Charge (set forth a clear and concise statement of the facts constituting the alleged unfair labor practices)

Within the past six months, Starbucks has interfered with, restrained, and coerced its employees in the exercise of rights protected by Section 7 of the Act by unlawfully by: (1) terminating employee (b) (6), (b) (7)(C) because (b) (6), (b) (7)(C) engaged in protected concerted and union activities; (2) more strictly and discriminately enforcing workplace attendance rules against (b) (6), (b) (7)(C) because (b) (6), (b) (7)(C) engaged in protected concerted and union activities; and (3) depriving (b) (6), (b) (7)(C) and the Union of notice, representation, and an opportunity to bargain over (b) (6), (b) (7)(C) discipline following certification of the Union. The Union seeks injunctive relief under Section 10(j) of the Act to prevent irreparable destruction of employee rights by Starbucks' illegal activity, which is increasing in aggression and severity daily.

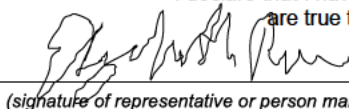
3. Full name of party filing charge (if labor organization, give full name, including local name and number)
Chicago & Midwest Regional Joint Board, Workers United/SEIU

4a. Address (Street and number, city, state, and ZIP code) 333 Ashland Ave. Chicago, Illinois 60607	4b. Tel. No. 312-378-6100
	4c. Cell No.
	4d. Fax No.
	4e. e-mail

5. Full name of national or international labor organization of which it is an affiliate or constituent unit (to be filled in when charge is filed by a labor organization)
Workers United/SEIU

6. DECLARATION

I declare that I have read the above charge and that the statements
are true to the best of my knowledge and belief.



(signature of representative or person making charge)

Elizabeth L. Rowe, Attorney

(Print/type name and title or office, if any)

Dowd, Bloch, Bennett, Cervone, Auerbach & Yokich LLP

Address 8 S. Michigan Ave., 19th Fl., Chicago, IL 60603

Date June 17, 2022

Tel. No.
312-372-1361

Office, if any, Cell No.

Fax No.

e-mail
erowe@laboradvocates.comWILLFUL FALSE STATEMENTS ON THIS CHARGE CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001)
PRIVACY ACT STATEMENT

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